

**FILED**

**FEB 11 2015**

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,

)

Plaintiff,

)

CRIMINAL NO. 15-mj-7006

)

vs.

)

LAMARCUS DEVON JACKSON

)

Title 18, United States Code,  
Sections 1951, 924(c)(1)(A)

)

Defendant.

)

)

STEPHEN C. WILLIAMS  
U.S. MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS OFFICE

**CRIMINAL COMPLAINT**

I, Daniel D. Cook, Special Agent with the Federal Bureau of Investigation's (FBI), the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**COUNT 1**

**INTERFERENCE WITH COMMERCE BY ROBBERY**

On or about January 11, 2015, in St. Clair County, within the Southern District of Illinois,

**LAMARCUS DEVON JACKSON**

defendant herein, while aiding and abetting four other persons known to law enforcement, did commit robbery, which robbery did obstruct, delay and affect commerce and the movement of articles and commodities in such commerce, in that:

(1) The defendant did take and obtain, and attempt to take and obtain, United States currency belonging to Shop 'n Save, from employees of Shop 'n Save, in their presence and against their will by means of actual and threatened force, violence and fear of injury to their persons, by brandishing firearms, being a silver revolver, a chrome handgun, a black handgun, and a long rifle with a high capacity magazine.

(2) At all times material to this Complaint, Shop 'n Save, located at 1028 Camp Jackson Road, Cahokia, Illinois was engaged in the retail sale of food, liquor and other grocery items, in interstate commerce and an industry which affects interstate commerce.

All in violation of Title 18, United States Code, Section 1951.

**COUNT 2**

**CARRY AND USE OF A FIREARM DURING A CRIME OF VIOLENCE**

On or about January 11, 2015, in St. Clair County, within the Southern District of Illinois,

**LAMARCUS DEVON JACKSON**

defendant herein, did knowingly use, carry and brandish, a firearm, being a silver revolver, a chrome handgun, a black handgun, and a long rifle with a high capacity magazine, during and in relation to, and did knowingly possess in furtherance of, a crime of violence for which he may be prosecuted in a court of the United States, that is: Interference with Commerce by Robbery as named and fully described in Count 1, in violation of Title 18, United States Code, Section 924(c)(1)(A).

**AFFIDAVIT**

Your affiant, Daniel D. Cook, after being duly sworn, does hereby state that he is a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and has been so employed for five years, and as such, is vested with the authority to investigate violations of Federal laws, including Titles 18 and 21 of the United States Code. Your affiant also has six years prior Federal law enforcement experience as a United States Postal Inspector and six years prior state law enforcement experience as a municipal Police Officer for the City of Lincoln, Nebraska. Your affiant is currently assigned to the Springfield Division of the FBI, Fairview Heights,

Illinois Resident Agency and has primary investigative responsibilities for violent and drug crimes occurring in the Southern District of Illinois.

The statements contained in this affidavit are based on the investigation of your Affiant, as well as information derived from reports and interviews of the law enforcement officers and witnesses named herein. In support of this Complaint, your Affiant states as follows:

1) On January 11, 2015, at approximately 9:42p.m., four masked and gloved individuals entered the Shop ‘n Save grocery store, located at 1028 Camp Jackson Road, Cahokia, Illinois 62206, through the main customer entrance and exit door. The first individual to enter the store (hereinafter SUSPECT 1) was wearing a dark colored hooded sweatshirt with the hood pulled over a black ski mask, dark pants, white gloves, and was armed with what appears to be a rifle with a wood stock, bayonet and high capacity magazine. The second individual to enter the store (hereinafter SUSPECT 2) was wearing a dark colored hooded jacket with white stripes down the side with the hood pulled over a black ski mask, dark pants, white shoes, white gloves, carried a black backpack slung from one shoulder, and was armed with what appears to be a black semi-automatic handgun. The third individual to enter the store (hereinafter SUSPECT 3) was wearing a dark colored hooded sweatshirt with the hood pulled over a black ski mask, dark colored pants, dark colored shoes, and was armed with what appears to be a silver colored large framed revolver. The fourth individual to enter the store (hereinafter SUSPECT 4) was wearing a dark colored hooded sweatshirt with the hood pulled over a black ski mask, blue jeans and was armed with what appears to be a silver colored semi-automatic handgun.

2) Upon entering the Shop ‘n Save grocery store, SUSPECT 1 positioned himself at the front exit pointing his rifle at customers and employees in the store. SUSPECT 3 positioned

himself near a checkout lane and pointed his handgun down at the floor. SUSPECT 4 approached the customer service desk area and pointed his handgun at a Shop n' Save customer with the initials of Q.G. and ordered him to the ground. SUSPECT 2 approached the customer service desk, jumped over the counter and attempted to enter through a door to the customer service area containing the store's safe while giving orders to the employees inside to open the door. After initially failing to enter the safe room, SUSPECT 2 jumped back over the customer service desk when an employee with the initials of P.M. complied with SUSPECT 2's demands and opened the door into the safe room. SUSPECT 2 then threw a black backpack into the safe room doorway while jumping back over the customer service desk and giving demands to employees inside the safe room to fill it with money. Shop 'n Save employee P.M. took the backpack and began to fill it with bundles of United States currency from the open safe inside the safe room. SUSPECT 2 entered the safe room and grabbed United States currency from a register drawer and placed the United States currency into his left jacket pocket while P.M. filled the backpack with cash from the safe. SUSPECT 2 then took the backpack containing United States currency from P.M. and exited the safe room. All four SUSPECTS then exited the Shop 'n Save through the main customer entrance and exit doors and fled on foot through the Camp Jackson Shopping Center parking lot towards the nearby St. Joseph housing sub-division.

3) After the SUSPECTS exited the Shop 'n Save, employees of the grocery store notified the Cahokia Police Department, which responded to the Shop 'n Save and conducted an investigation.

4) Law enforcement officers received information that Byron Joshua Holton was involved in the armed robbery of Shop 'n Save on January 11, 2015. Additionally, law enforcement officers received information that on Monday, January 12, 2015, Holton purchased

a green Suburban style truck with rear tinted windows that had yellow temporary Illinois license plates affixed to the vehicle.

5) Surveillance conducted by your Affiant of an apartment complex in East St. Louis believed to be frequented by Holton resulted in the identification of a green 2004 Chevy Suburban with Illinois temporary license plate number 754R218. A query of law enforcement computer databases indicated that the Chevy Suburban was sold by Paylater Auto Sales, Inc., located at 2916 Camp Jackson Road, Cahokia, Illinois 62206.

6) Law enforcement officers spoke with employees of Paylater Auto Sales Inc. and reviewed paperwork pertaining to the sale of the green 2004 Chevy Suburban with Illinois temporary license plate number 754R218. The paperwork indicated the green 2004 Chevy Suburban with Illinois temporary license plate number 754R218 was purchased on January 12, 2015. The name listed as the applicant for the purchase of the green 2004 Chevy Suburban with Illinois temporary license plate number 754R218 was an individual with the initials of H.V.C. However, the signature on the “car application” appeared to be signed by “Byron Holton.” The Paylater Auto Sales Inc. paperwork indicated Paylater Auto Sales received \$1000.00 in United States currency as payment for the green 2004 Chevy Suburban with Illinois temporary license plate number 754R218. Several employees of Paylater Auto Sales told your Affiant they remembered the sale of the green 2004 Chevy Suburban with Illinois temporary license plate number 754R218 and remembered that two black males, one older and one younger, were together at the time the green 2004 Chevy Suburban with Illinois temporary license plate number 754R218 was purchased. The employees remember the younger black male paying for the green 2004 Chevy Suburban with Illinois temporary license plate number 754R218 in \$5.00 and \$10.00 bills.

7) The Cahokia Police Department canvassed businesses nearby Shop 'n Save for surveillance video on the night of January 11, 2015 in an attempt to assist in the identification of the armed robbers. Upon reviewing surveillance camera video from a Moto Mart gas station just prior to the time of the robbery, a red four-door sedan with a spoiler, tinted windows, and silver window trim was identified parked for approximately 25 minutes at the Moto Mart tire air pumps with a direct line of sight to the Shop 'n Save entrance. In the surveillance video a black male is seen exiting the vehicle's driver side door to use the air pump.

8) Law enforcement officers received information that the individuals involved in the Shop 'n Save robbery used a red vehicle as a get-away car and one of the individuals involved in the Shop n' Save robbery lived on St. Barbara Lane in Cahokia, Illinois. Law enforcement officers located a red four-door Ford Taurus with a spoiler, tinted windows, and silver window trim bearing Illinois license plate R301087 parked in the driveway of 130 St. Barbara Lane, Cahokia, Illinois. Using a law enforcement computer database it was determined that the red Ford Taurus bearing Illinois license plate R301087 was registered to Durand L. Harper at 130 Saint Barbara Lane, Cahokia, Illinois 62206. The red Ford Taurus with Illinois license plate R301087 appeared to be the same red four door sedan observed in the Moto Mart surveillance video on January 11, 2015.

9) On February 2, 2015 law enforcement officers to include your Affiant made contact with Harper at 130 Saint Barbara Lane in Cahokia, Illinois. Harper agreed to be interviewed by law enforcement officers at the Cahokia Police Department. Harper was advised of his Miranda rights and agreed to be interviewed. The interview was audio and video recorded. Harper was shown a surveillance photograph of the red four-door sedan vehicle observed in the Moto Mart surveillance video from January 11, 2015, which he identified as his

vehicle, a red 2002 Ford Taurus registered in his name. Harper stated that he has had the red Ford Taurus for approximately two or three years. Harper admitted to driving to Shop ‘n Save on the evening of January 11, 2015 to purchase a soda for his wife and he stated that he went to Moto Mart to put air in a tire.

10) Harper initially denied prior knowledge or involvement in the Shop ‘n Save robbery. Later in the interview, Harper admitted he was approached by Holton to assist in the robbery of Shop ‘n Save. Harper admitted to being a “look out” and the “get away” driver.

11) Harper identified the robbers of the Shop ‘n Save as an individual he knows as “Josh” a.k.a. “Gyro,” another individual he knows as “Dre,” and two other black males whose names he did not know. Harper stated he has known “Josh” a.k.a. “Gyro” since high school. Harper was shown a known photograph of Byron Josh Holton, date of birth of 08/30/1988, who he positively identified as the person he knows as “Josh” a.k.a. “Gyro.”

12) Harper admitted that he went into the Shop ‘n Save prior to the robbery to buy a soda and to see how many individuals were in the store. Harper admitted to then calling and sending text messages to “Dre” prior to the commission of the Shop ‘n Save robbery to tell him that it was “ok” to enter the Shop ‘n Save. Harper stated that he then sat at the Moto Mart during the time of the commission of the robbery as a “look out.” Harper stated that he then drove back to his house which is a very short distance from Shop ‘n Save where he met “Josh” a.k.a. “Gyro,” “Dre,” and the two other black males – all of whom had fled from the Shop ‘n Save on foot. Harper stated that “Josh” a.k.a. “Gyro,” “Dre,” and the other two black males got into his car when he pulled up and he drove them out of Cahokia after the robbery. Harper admitted that he saw the four individuals with the guns and the clothing they wore into the Shop ‘n Save to commit the robbery. Harper also admitted he was paid \$300 for being the “look out”

and the “getaway driver.”

13) Harper signed a written consent to a search of his cellular telephone. Your Affiant observed outgoing text messages and outgoing and incoming telephone calls to and from telephone number (618) 250-9121 identified as “Dre” in Harper’s cellular telephone contact list. One of the outgoing text messages sent at 21:15:53 (9:15 p.m.) on 1/11/2015 to telephone number (618) 250-9121 stated, “I.its still there.” The subsequent outgoing text message sent at 21:16:26 on 1/11/2015 to telephone number (618) 250-9121 stated, “An cars still kinda pulling up.” Within seconds of these two text messages, at 21:19:19, there was an incoming phone call from telephone number (618) 250-9121. Subsequently, there were four outgoing calls to telephone number (618) 250-9121 between 21:25:40 and 21:32:55. The robbery of the Shop ‘n Save occurred at approximately 9:42 p.m. The report was received by the Cahokia Police Department at 9:44 p.m.

14) On February 4, 2015, law enforcement officers, to include your Affiant, made contact with Byron Josh Holton, date of birth 08/30/1988. Holton agreed to be interviewed by law enforcement officers at the Cahokia Police Department. The interview was audio and video recorded. Holton was advised of his Miranda rights and agreed to be interviewed. Holton stated he purchased a green 2004 Chevy Suburban from Paylater Auto Sales Inc. in January 2015. Holton stated a friend with the initials of H.V.C. was with him when he purchased the green 2004 Chevy Suburban because H.V.C. had a valid driver’s license and Holton believed Paylater Auto Sales Inc. would not sell him a vehicle without a valid driver’s license. Holton stated he completed the Paylater Auto Sales Inc. “Car Application” paperwork and he signed the “Car Application” paperwork. Holton stated he paid \$1000.00 in United States currency to Paylater Auto Sales Inc. for the green 2004 Chevy Suburban.

15) Holton initially denied knowledge or involvement in the Shop ‘n Save robbery on January 11, 2015. Later in the interview Holton stated on January 11, 2015, a black male he knows as “LaMarcus” came over to his residence, and gave him \$1300.00 in United States currency to “hold onto” for him. Holton continued to deny knowledge or involvement in the Shop ‘n Save robbery on January 11, 2015.

16) During a second audio and video recorded interview on February 4, 2015, Holton admitted he had prior knowledge of and participated in the robbery of the Shop ‘n Save on January 11, 2015. Holton stated he was approached by “LaMarcus” on the Friday (January 9, 2015) before the Shop ‘n Save robbery and Holton agreed to participate in the robbery. On Sunday April 11, 2015, Holton met “LaMarcus,” a black male he knows as “Dre,” a black male he knows as “D. Hodges,” and a black male he knows as “D” at a residence in Cahokia, Illinois, near the Shop n’ Save grocery store. Holton stated “LaMarcus” provided clothing and firearms to him, “Dre,” and “D. Hodges.” Holton stated he was provided a silver handgun, “Dre” was provided a silver handgun, “D. Hodges” was provided a rifle, and “LaMarcus” had a black handgun. Holton stated that “D” (identified as Durand Harper) was the “look out” and “get away” driver. Holton stated that “D” went to the Shop ‘n Save before the robbery to buy a soda and that “D” then called “Dre’s” phone to tell him it was clear to go in.

17) Holton further stated that after being provided firearms and clothing from “LaMarcus,” Holton, “Dre,” “D. Hodges,” and “LaMarcus” walked through an alleyway to the Shop ‘n Save. Holton said that he, “LaMarcus,” “Dre,” and “D. Hodges” entered the Shop ‘n Save through the customer entrance door. Upon entering the Shop ‘n Save, Holton said he positioned himself in the front of the store and guarded the doors. Holton said it was “LaMarcus” that vaulted the customer service counter and obtained the money from the Shop ‘n

Save safe room. After "LaMarcus" jumped back over the customer service counter carrying a black back pack he (Holton), "LaMarcus," "Dre," and "D. Hodges" ran out of the Shop 'n Save.

18) After running out of the Shop 'n Save, Holton, "LaMarcus," "Dre," and "D. Hodges" ran to "D's" house and got into "D's" vehicle. "D" drove them to East St. Louis, Illinois. Holton stated that when they arrived in East St. Louis, they parked near the "tower apartments," and at that time "LaMarcus" gave everybody various amounts of United States currency from the black back pack. Holton said he received \$1300.00 in United States currency. He further stated that after receiving the United States currency, Holton, "Dre" and "D. Hodges" gave the clothing and firearms provided by "LaMarcus" back to "LaMarcus." "D" then drove Holton, "LaMarcus," "Dre," and "D. Hodges" to various separate locations and they exited "D's" car. Holton said "D" drove him to his residence in Cahokia, Illinois.

19) On February 5, 2015, Holton was re-interviewed at the Cahokia Police Department. Holton was again advised of his Miranda rights and agreed to be interviewed. The interview was audio and video recorded. Holton was shown surveillance video and surveillance photos of the robbery of the Shop 'n Save on January 11, 2015. Holton then identified himself as SUSPECT 1, the individual entering the Shop 'n Save first carrying the rifle with a wood stock, bayonet and high capacity magazine. Holton identified "LaMarcus" as SUSPECT 2, the second individual entering the Shop 'n Save carrying a black semi-automatic handgun wearing a dark colored hooded jacket with white stripes down the side. Holton identified "D. Hodges" as SUSPECT 3, the third individual entering the Shop 'n Save carrying what appeared to a silver colored large framed revolver. Holton identified "Dre" as SUSPECT 4, the fourth individual entering the Shop 'n Save carrying a silver colored semi-automatic handgun.

20) On February 5, 2015, law enforcement officers to include your Affiant, made contact with Devante J. Hodges, a black male, date of birth 10/15/1992. Hodges agreed to be interviewed by law enforcement officers at the Cahokia Police Department. Hodges was advised of his Miranda rights and agreed to be interviewed. The interview was audio and video recorded. Hodges denied prior knowledge of, or involvement in, the Shop ‘n Save robbery that occurred on January 11, 2015.

21) On February 6, 2015, Hodges asked to speak to law enforcement officers again. Hodges was re-interviewed at the Sauget Police Department. Hodges was again advised of his Miranda rights and agreed to be interviewed. The interview was audio and video recorded. Your Affiant participated in this interview.

22) Hodges stated that on January 11, 2015, he was picked up at his home by a black male driving a red car and that the car was occupied by individuals he knows as “LaMarcus” and by “Josh” (identified as Byron Josh Holton). Hodges stated he did not previously know the black male driving the vehicle. The black male drove him (Hodges), “LaMarcus,” and “Josh” to “Dre’s” residence in the St. Joseph housing sub-division in Cahokia, Illinois. Hodges stated he was previously familiar with “LaMarcus,” “Dre,” and “Josh.” Once at “Dre’s” residence he was provided a silver colored revolver and by “Josh” and “Dre.” At “Dre’s” residence the plan to rob the Shop ‘n Save was discussed among “Josh,” “LaMarcus,” “Dre,” and the black male who drove the red vehicle, and himself (Hodges). Hodges said he, “Josh,” “Lamarcus,” and “Dre” then walked to the Shop ‘n Save and committed the robbery.

23) Hodges was shown surveillance video and surveillance photos of the robbery of the Shop ‘n Save on January 11, 2015. Hodges then identified himself as SUSPECT 3, the third individual entering the Shop ‘n Save carrying what appeared to be a silver colored large framed

revolver. Hodges identified “”LaMarcus” as SUSPECT 1, the first individual entering the Shop ‘n Save carrying the rifle with a wood stock, bayonet and high capacity magazine. Hodges identified “Josh” as SUSPECT 2, the second individual entering the Shop ‘n Save carrying a black semi-automatic handgun wearing a dark colored hooded jacket with white stripes down the side. Hodges identified “Dre” as SUSPECT 4, the fourth individual entering the Shop ‘n Save carrying a silver colored semi-automatic handgun.

24) Hodges further stated that after running out of the Shop ‘n Save, Hodges, “Josh”, “LaMarcus,” and “Dre,” ran to the red car parked near “Dre’s” house. The black male drove them to East St. Louis, Illinois. Hodges stated that when they arrived in East St. Louis, they parked near the “tower apartments,” and at that time “Josh” gave everybody various amounts of United States currency from the black backpack. Hodges said he received about \$1000.00 in United States currency. Hodges further stated that after receiving the United States currency, he gave the silver revolver to “Josh.” Hodges said “LaMarcus” exited the red vehicle carrying the rifle with wood stock and put it into the trunk of another car. Hodges said the black male then drove him to the City View subdivision in Cahokia, Illinois, where he got out of the red vehicle.

25) On February 4, 2015, law enforcement officers to include your Affiant, made contact with Undray Cortez Webb, a black male, date of birth 05/19/1989. Webb agreed to be interviewed by law enforcement officers at the Cahokia Police Department. Webb was advised of his Miranda rights and agreed to be interviewed. The interview was audio and video recorded. Webb denied prior knowledge of, or involvement in, the Shop ‘n Save robbery that occurred on January 11, 2015.

26) On February 6, 2015, Webb requested to speak to the Chief of the Cahokia Police Department. Webb was then re-interviewed at the Cahokia Police Department. Webb was again

advised of his Miranda rights and agreed to be interviewed. The interview was audio and video recorded.

27) Webb admitted that he was involved in the robbery of the Shop ‘n Save on January 11, 2015. Webb stated that on January 11, 2015 he met with “LaMarcus,” “Josh,” and Durand Harper at his (Webb’s) residence in Cahokia, Illinois. Webb stated that another black male was with “LaMarcus,” “Josh,” and Durand Harper who he did not previously know. Webb was shown a photograph of Devante Hodges and he indicated that was the other black male that came to his residence that day. Webb stated that while at his residence, he, “Josh,” “LaMarcus,” Harper and the other black male (identified as Hodges) discussed the plan to rob Shop ‘n Save. Webb indicated that he had a silver colored semi-automatic handgun and he did not check to see if it was loaded. Webb said that he “Josh,” “Lamarcus,” and the other black male (Hodges) walked to the Shop ‘n Save and committed the robbery.

28) Webb stated that Harper had gone into the Shop ‘n Save prior to the robbery to see how many individuals were present. Webb stated that Harper called him (Webb) on his cell phone to advise him that the “coast was clear.”

29) Webb was shown surveillance video and surveillance photos of the robbery of the Shop ‘n Save on January 11, 2015. Webb identified himself as SUSPECT 4, the fourth individual entering the Shop ‘n Save carrying a silver colored semi-automatic handgun. Webb identified “LaMarcus” as SUSPECT 1, the first individual entering the Shop ‘n Save carrying the rifle with a wood stock, bayonet and high capacity magazine. Webb identified “Josh” as SUSPECT 2, the second individual entering the Shop ‘n Save carrying a black semi-automatic handgun wearing a dark colored hooded jacket with white stripes down the side. Webb identified

the other black male (identified in a photo as Hodges) as SUSPECT 3, the third individual entering the Shop ‘n Save carrying what appeared to be a silver colored large framed revolver.

30) On February 10, 2015, law enforcement officers made contact with LaMarcus Devon Jackson, a black male with a date of birth of 12/31/1986. Jackson was arrested for a St. Clair County misdemeanor arrest bench warrant. Jackson was transported to the Cahokia Police Department.

31) At the Cahokia Police Department, Jackson was placed in an audio and video recorded interview room. Jackson was advised of his Miranda rights and agreed to be interviewed. Your Affiant participated in the interview. Jackson initially denied prior knowledge of, or involvement in, the Shop ‘n Save robbery that occurred on January 11, 2015, in Cahokia, Illinois. Jackson said he believed he would have been at home getting his children ready for school the next day at the time the Shop ‘n Save robbery occurred.

32) Later in the interview, Jackson admitted he did participate in the Shop ‘n Save robbery. Jackson said he was approached by an individual he knows as “Josh” who requested his assistance in committing a robbery at the Shop ‘n Save in Cahokia, Illinois. Jackson was shown a known photograph of Byron Josh Holton, date of birth 08/30/1988, who he positively identified as the person he knows as “Josh.”

33) Jackson said he met “Josh” at “Dre’s” house in the St. Joseph housing sub-division in Cahokia, Illinois, on the day the Shop ‘n Save robbery occurred (01/11/2015). Jackson was shown a known photograph of Undray C. Webb, date of birth 05/19/1989, who he positively identified as the person he knows as “Dre.” Jackson said he was instructed by “Josh” to bring extra clothing and bullets for firearms with him when he came to “Dre’s” house. Jackson said he obtained the bullets from his father’s residence. Jackson stated that he brought several different caliber bullets, including .357 and 9 mm, to “Dre’s” house to load the firearms.

34) Jackson said at "Dre's" house an adult black male neighbor of "Dre's" was present. Jackson was shown a known photograph of Durand L. Harper, date of birth 11/03/1988, who he positively identified as the adult black male who is a neighbor of "Dre" who was present that night. Jackson said he, along with "Josh" and Harper, drove in Harper's red car and picked up an individual he knows as "D." Jackson was shown a known photograph of Devante J. Hodges, date of birth 10/15/1992, who he positively identified as the person he knows as "D." After picking up "D," they drove back to "Dre's" house.

35) Jackson said while at "Dre's" house, "Dre" and "Josh" produced firearms and gave him (Jackson) a long rifle with a wood stock. Jackson said he, "Dre," "Josh," and "D" changed their clothes with the clothes he (Jackson) had brought to "Dre's" house. Jackson further stated that after changing their clothes and arming themselves with firearms, Jackson, "Dre," "Josh," and "D" walked to the Shop 'n Save and committed the robbery.

36) Jackson was shown video surveillance of the Shop 'n Save robbery occurring on January 11, 2015. Jackson identified himself as SUSPECT 1, the individual entering the Shop 'n Save first carrying the rifle with wood stock, bayonet and high capacity magazine. Jackson identified "Josh" as SUSPECT 2, the second individual entering the Shop 'n Save carrying a black semi-automatic handgun wearing a dark colored hooded jacket with white stripes down the sides. Jackson identified "D" as SUSPECT 3, the third individual entering the Shop 'n Save carrying what appeared to be a silver colored large framed revolver. Jackson identified "Dre" as SUSPECT 4, the forth individual entering the Shop 'n Save carrying a silver colored semi-automatic handgun.

37) Jackson said his role in the Shop 'n Save robbery was to enter the store first with the big gun and scare everyone. After committing the robbery and running out of the Shop 'n Save, Jackson, "Dre," "Josh," and "D" ran to "Dre's" neighbor's car, parked in the St. Joseph housing subdivision and got into the red car. "Dre's" neighbor (Harper) then drove them to East St. Louis, Illinois. In East St. Louis, Illinois, near Waverly Avenue, while sitting in the red car, "Josh" gave everybody various amounts

of United States currency from a black backpack. Jackson said he received approximately \$1600.00 from "Josh." Jackson said prior to getting out of the red car, he gave the long rifle with a wood stock that he carried during the Shop 'n Save robbery to "Dre."

38) After interviewing Jackson about the Shop 'n Save robbery, law enforcement officers, to include your Affiant, interviewed Jackson about an armed robbery of the Alps grocery store, located at 800 Upper Cahokia Road, Cahokia, Illinois, that occurred on December 11, 2014. On December 11, 2014, 3 masked individuals each armed with what appear to be firearms, entered the Alps grocery store and stole United States currency from a store safe and cash register. At the time of the robbery, the Alps grocery store was open for business and several employees and a customer were inside the grocery store. Alps grocery store reported a loss of \$1700.00 in United States currency as a result of the robbery.

39) After initially denying involvement in the Alps grocery store robbery, Jackson admitted he, "Josh," and "Dre" planned and committed the Alps grocery store robbery, during which all three of them were armed with firearms. Jackson admitted he stole United States currency from the Alps grocery store safe. Jackson admitted receiving approximately \$300.00 in United States currency for participating in the Alps grocery store robbery.

40) As a result of the robbery on January 11, 2015, Shop 'n Save grocery store suffered a loss of \$7,050.00 in United States currency. The \$7,050.00 in United States currency were the receipts of, and property of, Shop 'n Save grocery store. Said receipts were from the sales at the Shop 'n Save grocery store of products that had moved in and were part of commerce as that term is defined in Title 18, United States Code, Section 1951.

FURTHER YOUR AFFIANT SAYETH NAUGHT.



Daniel D. Cook,  
Special Agent, Federal Bureau of Investigation

State of Illinois )  
                    ) SS.  
County of St. Clair )

Sworn to before me and subscribed in my presence on the 11th day of February 2015, at  
East St. Louis, Illinois.



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STEPHEN WILLIAMS  
United States Magistrate Judge

STEPHEN R. WIGGINTON  
United States Attorney

Ali Summers  
Assistant United States Attorney